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Honorable Frederick P. Corbit  
Chapter 11

8 **UNITED STATES BANKRUPTCY COURT**  
9 **EASTERN DISTRICT OF WASHINGTON**

Chapter 11

Bankr. Case No. 24-01421-FPC11

10 In re:

11 IDEAL PROPERTY INVESTMENTS LLC,  
12  
13 Debtor.<sup>1</sup>  
14  
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**MOTION FOR REIMBURSEMENT  
OF COMMITTEE EXPENSES**

16 The Official Committee of Unsecured Creditors (the “Committee”), by and through its  
17 undersigned counsel, respectfully submits this Motion for Reimbursement of Committee  
18 Expenses (the “Motion”) and states as follows:

19 **I. INTRODUCTION**

20 1. The Committee seeks reimbursement of administrative expenses that have been  
21 or will be incurred by its members in the course of fulfilling their fiduciary obligations in this  
22 matter. These out-of-pocket expenses include travel-related costs such as airfare, hotel  
23 accommodations, mileage, meal, rideshare and taxi services.  
24

25 <sup>1</sup> Debtor Ideal Property Investments, LLC (“Ideal”) is a related Debtor to Debtors Refreshing USA, LLC (85-  
3358945) (“Refreshing”), Case No. 24-01863-11; Water Station Management LLC (81012-2716) (“WSM”),  
26 Case No. 24-01864-11; and Creative Technologies, LLC (46-2581888) (“Creative” and, together with  
Refreshing and Water Station Management, “Opco Debtors”), Case No. 24-01866-11. Ideal, together with Opco  
Debtors and Debtors’ related affiliates are referred to herein as “Debtors” or “WST Enterprise.”

2. The Committee, specifically, requests authorization for reimbursement of up to \$25,000 in expenses for all Committee members, to be paid by the Debtor upon submission of invoices to the Debtor, with copies provided to the U.S. Trustee's Office and Committee members. Any reimbursement beyond this amount shall be subject to further application for final approval by this Court.

## II. BACKGROUND

3. On September 5, 2024 (the “Petition Date”), the Debtor filed a voluntary petition under Chapter 11 of the Bankruptcy Code.

4. Pursuant to section 1102(a) of title 11 of the United States Code (“Bankruptcy Code”), on October 7, 2024, the Acting United States Trustee (“UST”) appointed a three (3) member committee of unsecured creditors of Ideal Property Investments, LLC. [Dkt. No. 115]

5. Also pursuant to section 1102(a) of title 11 of the Bankruptcy Code, on November 18, 2024, the UST reconstituted and appointed a nine (9) member committee of unsecured creditors of Ideal Property Investments, LLC, Refreshing USA, LLC, Water Station Management, LLC, and/or Creative Technologies, LLC (respectively, the “Committee” and the “Debtors”). [Dkt. No. 274]<sup>2</sup>

6. On October 28, 2024, the Committee appointed Sterling Davis as Committee Chair. On November 21, 2024, the reconstituted Committee ratified this appointment.

7. On January 21, 2025, the Committee designated Sterling Davis as the Committee's representative at a mediation with First Fed, in connection with this matter, on behalf of the Committee. The mediation was conducted on April 30 and May 1, 2025 in Portland, Oregon.

<sup>2</sup> Pursuant to the Court's Order appointing the Official Committee of Unsecured Creditors in these jointly administered cases, the Committee represents the unsecured creditors of Ideal Property Investments, LLC, Refreshing USA, LLC, Water Station Management, LLC, and Creative Technologies, LLC. Expenses reimbursed to the Committee members are to be paid equally between the estate of Ideal Property Investments, LLC and the combined estates of Refreshing USA, LLC, Water Station Management, LLC, and Creative Technologies, LLC.

1           8.     Committee chair Sterling Davis incurred out-of-pocket travel expenses  
2     amounting to approximately \$1,000, including airfare, lodging, and related costs associated  
3     with his participation in the mediation. A declaration from Sterling Davis in support of this  
4     Motion is submitted to further detail and substantiate these expenses.

5           9.     The Committee chair and other members of the committee may attend hearings  
6     on confirmation of the liquidating plan and attend other proceedings in their official capacity.  
7     In carrying out these and other Committee responsibilities, Committee members have and will  
8     incur personal expenses, including but not limited to travel-related costs for attending key  
9     proceedings essential to advancing the case.

### 10                               **III. LEGAL BASIS FOR REIMBURSEMENT**

11           10.    11 U.S.C. § 503(b)(3)(F) authorizes reimbursement of actual, necessary  
12     expenses incurred by official committee members in the performance of their duties.

13           11.    The Committee's request aligns with standard bankruptcy practice, ensuring that  
14     committee members are not unduly burdened while serving in their fiduciary capacity.

15           12.    The Committee requests authority for reimbursement of a total not to exceed  
16     \$25,000 in actual and necessary expenses. Any expenses exceeding the requested \$25,000 shall  
17     be submitted for further Court approval.

### 18                               **IV. RELIEF REQUESTED**

19           WHEREFORE, the Committee respectfully requests that this Court enter an order:

20           A.     Authorizing the Debtor to reimburse up to \$25,000 in Committee member  
21     expenses upon submission of supporting invoices, with copies provided to the U.S. Trustee's  
22     Office and the Committee;

23           B.     Confirming that any reimbursement beyond \$25,000 shall be subject to  
24     subsequent application for approval; and  
25  
26

1 C. Granting such other and further relief as this Court deems just and proper.  
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3 DATED this August 15, 2025.  
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K&L GATES LLP

/s/ Michael J. Gearin

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*Attorneys for the Official Committee of  
Unsecured Creditors*  
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1 **CERTIFICATE OF SERVICE**

2 I certify that on August 15, 2025, I caused a copy of the foregoing Motion to be served  
3 by the Electronic Case Filing System for the United States Bankruptcy Court for the Eastern  
4 District of Washington.

5 s/ Anne Marie Landis  
6 Anne Marie Landis  
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